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Valli Kane & Vagnini

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August 29, 2023

Matthew L. Berman, Esq. mberman@vkvlawyers.com

BY ECF

Honorable Analisa Torres United States District Court Judge United States District Court for the Southern District of New York 500 Pearl St. New York, NY 10007

Re: Chalmers, et al. v. City of New York, Case No. 20 Civ. 3389 (AT)

Dear Judge Torres:

cc:

I am one of the lawyers for plaintiffs and the proposed class in the above-referenced case, and write to request a two page enlargement of Your Honor's page limitations in connection with our anticipated motion seeking preliminary approval of a stipulation of settlement in this case.

Your Honor's Individual Practices in Civil Cases limit memoranda of law in support of motions to 30 pages. We have finished drafting our memorandum of law in support of our anticipated motion for preliminary approval, and it is currently 32 pages. While we have done our best to pare our arguments down to avoid overburdening the Court, we believe we need a two page expansion in order to properly disclose all relevant information concerning the proposed settlement and its financial and non-financial components.

We have conferred with Defendant's counsel, who do not oppose this request.

Accordingly, we respectfully request that the Court endorse or so-order our letter request for enlargement of the page limit described above and permit us to file the motion within one day of receiving Your decision on this request.

Respectfully submitted,

VALLI KANE & VAGNINI LLP

/s Matthew L. Berman
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All counsel of record, via ECF and via email.